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7 **UNITED STATES DISTRICT COURT**  
8  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN JOSE DIVISION**

11 RICK WOODS, Individually and On Behalf  
of Others Similarly Situated

12 Plaintiff,

13 v.

14 GOOGLE INC.,

15 Defendant.  
16

CASE NO. 5:11-CV-01263-EJD

**DECLARATION OF WILLIAM KUNZ  
REGARDING COMPLIANCE WITH  
COURT ORDER**

1 I, William Kunz, declare as follows:

2 1. I am a Product Manager for Defendant Google Inc. ("Google"). I submit this  
3 declaration in compliance with the Court's Order Granting in Part and Denying in Part Plaintiff's  
4 Motion for Sanctions. I have personal knowledge of the facts stated in this declaration and if  
5 called as a witness, I could and would competently testify thereto.

6 2. I have been employed by Google since June 2007. During that period, my  
7 responsibilities have included Gmail Partner Edition, AdSense for Content (now called the  
8 Google Display Network or GDN), AdSense for Domains, Google Wallet, and AdSense for  
9 Search.

10 3. My current title is Product Manager, AdSense for Search. In that capacity, I have  
11 personal knowledge of the log files and database tables Google maintains with respect to clicks  
12 and impressions, including the fields of data contained in the log files and database tables.

13 4. I have reviewed a Court document, docket number 147 in this case, in which  
14 Google was ordered, on March 28, 2014, to provide Plaintiff Rick Woods with "descriptions  
15 of the log files and database tables Google maintains with respect to clicks and impressions,  
16 including the fields of data contained in the log files and database tables."

17 5. I have also reviewed a Court document, docket number 173 in this case, in which  
18 Google was ordered, on August 8, 2014 to provide:

19 a declaration from a Google officer or employee knowledgeable  
20 of the Adwords database and familiar with the material produced  
21 by Google to date, or someone authorized to speak on their behalf,  
22 certifying that: (1) the 900+ documents produced by Google in  
23 response to the Interim Order on DDJR #1 and DDJR #2 contain  
24 substantially complete descriptions of the log files and database  
25 tables Google maintains with respect to clicks and impressions,  
26 including the fields of data contained in the log files and database  
27 tables; and (2) Google does not have in its possession, custody,  
28 or control a list with general descriptions of the fields of data  
maintained within the log files and database tables substantially  
similar to but more extensive than that provided in the letters from  
Google's counsel attached as Exhibits L and M to Woods' Motion

1 for Sanctions.

2 6. I also understand that Google made 900+ documents, including descriptions of  
3 the schema of the Ads Database and descriptions of fields of data contained in log files and  
4 database tables, available for Plaintiff to inspect.

5 7. I have reviewed the 900+ documents Google made available for Plaintiff's  
6 inspection in response to the Interim Order on DDJR #1 and DDJR #2 and believe that these  
7 documents contain substantially complete descriptions of the log files and database tables  
8 Google maintains with respect to clicks and impressions, including the fields of data contained in  
9 the log files and database tables.

10 8. I also understand that Google's counsel provided descriptions of some fields of  
11 data maintained within database tables to Plaintiff's counsel in letters dated June 28 and July  
12 10, 2013, which were attached as Exhibits L and M to Woods' Motion for Sanctions and are  
13 mentioned in the Court document I quoted in Paragraph 5 above. I have reviewed those letters.

14 9. I confirm that Google does not have in its possession, custody, or control a list  
15 with general descriptions of the fields of data maintained within the log files and database  
16 tables substantially similar to but more extensive than that provided in the letters from Google's  
17 counsel attached as Exhibits L and M to Woods' Motion for Sanctions.

18 10. I am aware of a compilation of information recently created that includes general  
19 descriptions of the log files Google maintains with respect to clicks and impressions, which I  
20 understand to be the subject of a letter from Google's counsel to Plaintiff's counsel attached to  
21 this Declaration as Exhibit A.

22  
23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on August 20, 2014 in Mountain View, CA

25  
26   
27 William Kunz  
28

**Exhibit A**  
**to Kunz Declaration**

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August 21, 2014

**BY EMAIL AND HAND DELIVERY**

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Re: *Woods v. Google Inc.*,  
N.D. Cal. Case No. 5:11-cv-1263 EJD (HRLx)

Dear Brad,

On August 18, 2014, we became aware of a recently created compilation of information that includes general descriptions of log files Google maintains with respect to clicks and impressions. This production consists of .pdf files of an index file and links from that index file for this compilation of information. We are reviewing this collection of information and will produce the responsive and non-privileged information disclosed by this review. In the interim, kindly identify any links on the index page that Plaintiff would request that we prioritize in this review. We will provide a replacement version of this production that conforms to the parties' ESI protocol as soon as practicable.

I will soon be forwarding you a secure link to the file listed below:

File Name	Production Vol.	BegBates	EndBates
PROD031.zip	PROD031	GOOG00547067	GOOG00547139

The decryption password for this volume is s@ver123.

In addition, I will provide to you or one of your colleagues a hard copy of this production during the deposition of Derek Coatney today to ensure that you have an opportunity to question Mr. Coatney regarding these documents if you desire.

Please note that documents in this volume have been designated "HIGHLY CONFIDENTIAL—OUTSIDE ATTORNEYS' EYES ONLY" under the protective order in this action.

Very truly yours,



Eric B. Evans